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April 4, 2025

Jeremy J. Toner
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United States Probation Officer
Brooklyn, New York

Re: *United States v. James Young*, 23-cr-475

Dear Mr. Toner:

I am writing in brief reply to the government's letter of March 28, 2025. The government largely agrees with defense counsel's requested changes. With respect to ¶ 39, however, the government indicates that discussing this sealed report is appropriate because it "bears on the defendant's prior residence." Gov. Ltr. 2. The address listed in ¶ 39 also appears in ¶¶ 5, 10, 40, and 41. That is, therefore, not a reason to include sealed information.

Additionally, the defense continues to object to the two special conditions of supervised release. The proposed expansive financial condition, which goes well beyond the condition in the sentencing guidelines quoted by the government, is not appropriate simply because restitution is ordered.

Similarly, the case cited by the government with respect to searches does not address a search condition similar to the one proposed in Mr. Young's case. *United States v. Ettinger*, 723 F. App'x 38, 40 (2d Cir. 2018) does not relate to search conditions that include electronic data.

Respectfully submitted,

/s/
Allegra Glashausser
Assistant Federal Defender
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